

### REMARKS/ARGUMENTS

Claims 1-13 are pending in the present application and have been examined. The title has been objected to. Claims 1-13 have been rejected under 35 U.S.C. §102(b) over Clark et al. (U.S. Patent 6,058,378). The title has been amended hereby. In light of the attached amendments and below remarks, reconsideration of the present application is respectfully requested.

In paragraph 4 of the Office Action, the title of the invention has been objected to as not being descriptive. Applicants have amended the title as indicated in the attached to indicate the unique processing of bulk files by the present invention. Applicants submit that the title as amended is descriptive and withdrawal of the objection is therefore respectfully requested.

In paragraph 6 of the Office Action, claims 1-13 have been rejected under §102 over Clark. Applicants respectfully traverse this rejection. The Clark reference discloses a system and a method by which customers of financial institutions are provided with a single interface for access to a plurality of financial products and services provided by the financial institution. As described by Clark in column 7, lines 49 through column 10, line 48, in connection with Fig. 4, the system of Clark operates on single messages incorporating single transactions as received from the customer. Specifically, as shown in Fig. 4 and described at column 7, lines 52-59, the messages of Clark contain a header portion 32 and a main body portion 33 that “contains the specific instruction, inquiry, status or event information.” (emphasis added) As is clear from this and the remaining portions of Clark, its messages contain only single transactions. Furthermore, no where in Clark is it taught or suggested that a plurality of messages from customers are combined into a bulk file for transmission to the financial institution.

In contrast to the system and method as described in Clark, the present invention as recited in independent claims 1 and 6 explicitly requires “receiving a bulk file from the customer, the bulk file containing a plurality of funds of transfer transactions.”

This ability to operate on bulk files is one of the keys to the present invention. Rather than requiring customers to issue a single message containing a single transaction (as is required in Clark) the system and method of the present invention allows the customers to group all of their transactions into a single bulk file, which is then transmitted once to the system of the present invention.

The first processor of the system of the present invention as recited in claim 1 unbundles the single bulk file and groups the funds transfer transactions into two types, ones requiring foreign exchange and those not requiring such exchange. These two different types of transactions, unbundled from the single bulk file received from the customer, are then passed onto the appropriate separate processors as recited in the remainder of the claim. The method of independent claim 6 contains process limitations corresponding to the limitations as described above with respect to the system of claim 1.

The system and method of the present invention provides significant processing differences over the system of Clark, which in turn provide enhanced capability and ease of use for both customers and financial institutions. The present invention benefits the customer by allowing them to aggregate all their transactions into a single message. This relieves customer's overhead of having to prepare and transmit separate messages for each transaction. There is additionally a significant advantage of only transmitting a single message to the financial institution. As described in the present specification with respect to step 210 in Figure 2, since a message of the present invention contain sensitive financial instructions, the financial institutions are typically required by the customers to acknowledge the receipt of these message. In the system of Clark, if fifty messages are sent, fifty separate acknowledgements are required. These acknowledgements must be generated by the financial institution and maintained by the customer (in case of a question of whether a particular instruction was received). The structure and method of the present invention reduces these fifty acknowledgements to one. This structure and processes as explicitly recited in independent claims 1 and 6 are neither taught nor suggested by the Clark reference that requires processing of transactions from customers on a one by one

basis.

As Clark reference does not teach or suggest a system or method on operating on bulk files from customers as explicitly required by independent claims 1 and 6, withdrawal of the rejection of all of the claims of the present application on the basis of Clark is respectfully requested.

As each of the claims of the present application are currently in condition for allowance, such action is earnestly solicited.

Attached hereto is a marked-up version of the changes made to the specification and claims by the current amendment. The attached page is captioned “Version with markings to show changes made.”

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Respectfully submitted,

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**Version With Markings to Show Changes Made**

**In the Title:**

System and Method for Processing Foreign Currency Payment Instructions

Contained in Bulk Files